

CHARLES GEERHART (SBN 139769)
PAOLI & GEERHART, LLP
785 Market Street, Suite 1150
San Francisco, CA 94103
(415) 498-2101

Attorneys for Plaintiffs
DORIS CROSLEY and KENNETH COLLINS

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

DORIS CROSLEY, and KENNETH
COLLINS

Plaintiffs,

vs.

CITY OF PITTSBURG ET AL

Defendants.

Case No. C 05-04051 JSW

STIPULATION FOR ORDER TO DEPOSE
OFFICER LOMBARDO AFTER
DISCOVERY CUTOFF

The parties to this action hereby stipulate as follows:

That due to the fact that defendant Lombardo has left the Pittsburg Police Department and has had other training obligations with his new department (Citrus Heights PD) which have prevented scheduling him for a deposition, Officer Lombardo and all other defendants, by and through their counsel, agree that plaintiffs may depose Officer Lombardo after the June 18 discovery

Crosley et al v. City of Pittsburg et al

USDC No. C 05-04051 JSW

STIPULATION FOR ORDER TO DEPOSE
OFFICER LOMBARDO AFTER DISCOVERY CUTOFF

cutoff in this matter. The defense agrees to produce officer Lombardo for deposition at a mutually agreeable time and place. The parties agree and stipulate to an order stating such.

Dated: May 4, 2007

PAOLI & GEERHART LLP

By

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/) within this efiled document.

/s/

CHARLES O. GEERHART

Attorneys for Plaintiffs Crosley and Collins

Dated: May ____, 2007

EDRINGTON SCHIRMER ET AL

By

/s/

Michael Clark

Attorneys for Defendants

City of Pittsburg, Aaron Baker, Officers Pratt,
Bancroft and Lombardo

Crosley et al v. City of Pittsburg et al

USDC No. C 05-04051 JSW

STIPULATION FOR ORDER TO DEPOSE

OFFICER LOMBARDO AFTER DISCOVERY CUTOFF

ORDER RE DEPOSITION OF OFFICER LOMBARDO

The Court has reviewed the Parties' STIPULATION FOR ORDER TO DEPOSE OFFICER LOMBARDO AFTER DISCOVERY CUTOFF. Good cause appearing, the Court approves the stipulation and orders that plaintiff s may depose Officer Lombardo after the discovery cutoff of June 18 in this matter.

IT IS SO ORDERED.

Date: May 11, 2007


Hon. Jeffrey White
Judge of the U.S. District Court